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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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In the Matter of )  
)  
)

Petition By the United States Department )  
Of Transportation For Assignment Of An )  
Abbreviated Dialing Code (N11) To Access )  
Intelligent Transportation System (ITS) )  
Services Nationwide )  
\_\_\_\_\_)

CC Docket No. 92-105  
NSD-L-99-24

REPLY COMMENTS OF AT&T CORP.

Pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. § 1.415, AT&T Corp. ("AT&T") hereby replies to the comments of other parties concerning the Department of Transportation's Petition For Rulemaking seeking assignment of an "N11" abbreviated dialing code to be used to access intelligent transportation system services.

AT&T wishes to reply briefly to the comments of MCI WorldCom Inc. ("MCI"). MCI seeks to bootstrap from the fact that there are now petitions pending that seek assignment of the two remaining unassigned N11 codes to the wholly unfounded claim that there is an urgent need for the Commission to "initiate a comprehensive review" of abbreviated dialing arrangements.<sup>1</sup> This request is meritless, and should be denied.

<sup>1</sup> \_\_\_\_\_  
MCI, p. 1.

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Despite MCI's effort to portray N11 assignment as somehow in crisis, it is plain that the Commission's N11 Order<sup>2</sup> established a workable framework for N11 allocation. There are currently two unassigned N11 codes. In the two and one-half years since the N11 Order was released, only two requests for assignment of those codes have been filed; and the Commission is proceeding, with the benefit of extensive public comment, to consider whether it would be in the public interest to grant those requests. There is simply no evidence that the current N11 assignment process is in any way inadequate for the task at hand.

MCI's real aim appears to be to breathe life into its moribund attacks on the Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council ("NANC"), which was recently subjected to public comment.<sup>3</sup> The working group's report concerned abbreviated dialing arrangements other than N11 codes, and MCI's comments seek to drag such non-N11 codes into its proposed comprehensive NPRM.<sup>4</sup> In the abbreviated dialing arrangements docket, MCI not only attacked the conclusions of the working group, but also accused it of bad faith, arguing that its members favored ILECs and wireless carriers. However, as AT&T showed in that

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<sup>2</sup> First Report and Order and Further Notice of Proposed Rulemaking, The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, FCC 97-51 (released February 19, 1997) ("N11 Order").

<sup>3</sup> See Public Notice, Common Carrier Bureau Seeks Comment on North American Numbering Council Recommendation Concerning Abbreviated Dialing Arrangements, CC Docket No. 92-105 (released Dec. 14, 1998).

<sup>4</sup> See MCI, p. 3.

proceeding, MCI's allegations -- both as to the working group's conclusions and its purported bias -- are utterly meritless.<sup>5</sup>

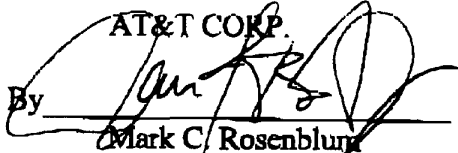
MCI's call for a comprehensive review of abbreviated dialing arrangements proposes a "solution" for a nonexistent problem. There is simply no evidence that existing processes for handling N11 assignment are inadequate, and the Commission has already received both the NANC working group's report on other abbreviated dialing arrangements

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<sup>5</sup> See Reply Comments of AT&T Corp., pp. 2-3, filed January 27, 1999 in Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council Regarding Abbreviated Dialing Arrangements, CC Docket No. 92-105.

and public comments thereon. In sum, the Commission, the industry and the public would be ill-served by devoting scarce resources to an NPRM on abbreviated dialing arrangements.

Respectfully submitted,

AT&T CORP.  
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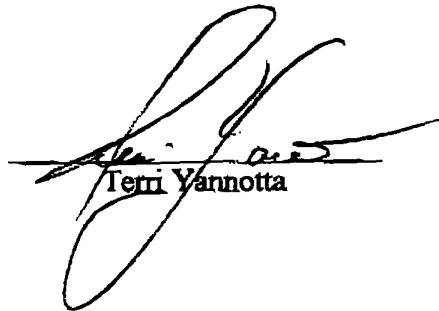
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**CERTIFICATE OF SERVICE**

I, Terri Yannotta, do hereby certify that on this 20<sup>th</sup> day of August, 1999, a copy of the foregoing "Reply Comments of AT&T Corp." was filed by U.S. first-class mail, postage prepaid to the parties listed on the attached service list.



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